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ABSTRACT

Forms Clearance standards and regulations are used by the Office of Management and Budget and by the Education Division of the Department of Health, Education and Welfare in order to upgrade the quality of federal data collection, to minimize cost, minimize reporting burden, maximize utility, and to protect the privacy rights of respondents. Review criteria are classified into eight categories: need, burden, cost, redundancy, utility, survey design, instrumentation, and administrative criteria; and are applied to eleven components of an educational research plan: research problem, respondent sample, sampling design, study design, instrumentation, data collection, data processing, data analysis, reporting results, data retention, and data utilization. However, these regulations cover only a small part of federal reporting requirements; they describe no penalties for non-compliance, and do not deal with the major causes of paperwork burden. Only a small percent of clearance requests have been disapproved. It is concluded that the review process will result in little or no progress toward the objectives of the Federal Reports Act. (Author/CTM)

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OMB Forms Clearance: Restrictions on Educational Research Plans*

Donald L. Coan
Research for Better Schools

Introduction

In this paper an analysis is made of Forms Clearance standards and regulations (i.e., criteria) used for reviewing data collection requests from federal education agencies. The paper focuses on the potential impact of these review criteria on the development of educational research proposals under federal RFP arrangements; implications of Forms Clearance review for research practice in education are also discussed.

Before data can be collected by a contractor on behalf of a federal education agency, the research plan and instrumentation to be used must be approved first by the Education Division of the Department of Health, Education and Welfare and then by the Office of Management and Budget (OMB) which gives final clearance. OMB review is administered by the Statistical Policy Division; its counterpart in the Education Division is known as the Education Data Acquisition Council (EDAC). The EDAC reviews data collection requests originating from major education agencies such as the National Institute of Education, United States Office of Education, National Center for Education Statistics, and the Office of Civil Rights. By examining the nature of OMB and EDAC criteria,

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and to a limited extent, how these criteria are applied to actual data collection proposals, it is possible to gain insight into the federal government's role vis a vis Forms Clearance review with respect to regulation of federally sponsored research in education.

The paper is divided into three parts. The first part describes the origins and sources of Forms Clearance criteria. Part two is an examination of the relevance of the principal review criteria to eleven aspects of a research (data collection) plan: (1) Research Problem, (2) Respondent Sample, (3) Sampling Design, (4) Study Design, (5) Instrumentation, (6) Data Collection, (7) Data Processing, (8) Data Analysis, (9) Reporting Results, (10) Data Retention, and (11) Data Utilization. The final part of the paper discusses certain questions and issues pertaining to the intrinsic and instrumental nature of Forms Clearance criteria.

Origins and Sources of Forms Clearance Criteria

Before delineating Forms Clearance criteria and examining them in terms of the substantive nature of research plans, it is important to review how they came into being. Two major pieces of federal legislation, the Federal Reports Act of 1942 and the Budget and Accounting Procedures Act of 1950, were primarily responsible for the birth and development of Forms Clearance criteria used today.

The Federal Reports Act (FRA) as amended by Section 499 of the Trans-Alaska Pipeline Authorization Act (44 U.S.C. 3501-3512) is the principal legislative authority for the OMB review and clearance function. The

broad objectives of review are indicated in Section 3501 of the Act which provides that:

> Information needed by the various federal agencies should be obtained with a minimum burden upon business enterprises (especially upon small business enterprises) and other persons required to furnish such information, at a minimum of cost to the Government, that all necessary duplication of efforts in obtaining such information through the use of reports, questionnaires, and other such methods should be eliminated as rapidly as practicable, and that information collected and tabulated by any federal agency should insofar as is expedient be tabulated in a manner to maximize the usefulness of the information to other federal agencies and the public.

Four main objectives were established by the Act: (1) minimize duplication in the collection of information, (2) minimize the cost to the government of collection of information, (3) minimize reporting burden on respondents, and (4) maximize utility of information collected. The first three objectives were intended to safeguard the public interest against excessive demands for information by the federal government. This safeguard function is primarily regulatory in nature. The fourth objective of the FRA is primarily aimed at promoting the public interest by maximizing opportunities for sharing of information among federal agencies and between the government and the public.

The second most important piece of legislation which gave rise to Forms Clearance criteria is the Budget and Accounting Procedures Act of 1950 (31 U.S.C. 18a). This Act (BAAPA) authorizes the OMB "to develop programs and to issue regulations and orders for the improved gathering, compiling, analyzing, publishing, and dissemination of statistical

information for any purpose by the various agencies in the executive branch of the government" (Sec. 103). It also directed the OMB to ensure that sound statistical standards in survey design and statistical procedures in general are maintained. Pursuant to this Act, the OMB issued Circular No. A-46, "Standards and Guidelines for Federal Statistics" (Revised May 3, 1974), in order to establish uniform statistical standards and guidelines for conducting surveys and publishing and releasing federal statistics to be followed by agencies and by contractors and grantees in collection of data under federally sponsored contracts and grants. Anticipated benefits from adherence to these standards and guidelines were outlined in A-46 as follows: (1) greater efficiency in the design and conduct of statistical surveys, (2) reduction in the reporting burden on respondents, (3) greater uniformity and comparability among statistical series and studies, and (4) improved accuracy of federal statistics. One of the primary responsibilities given to the OMB by A-46 is to provide guidance to the departments and agencies in interpreting and applying these standards and guidelines, and monitor adherence to them when reviewing forms and other documents submitted for approval under the FRA. The contents of the standards and guidelines of A-46 are contained in eight Exhibits. Exhibits A and B probably contain the two most important sets of standards for contract research in education. Exhibit A, "Standards for Statistical Surveys," contains standards for use in planning and conducting statistical surveys and other kinds of data collection. Exhibit B, "Standards for the Publication of Statistics,"

provides general standards for the publication of statistical results.

Pursuant to the FRA and the BAAPA, Circular No. A-40, "Managment of Federal Reporting Requirements" (Revised May 3, 1973) and Attachment A to that Circular, "Clearance of Public Reporting and Recordkeeping Requirements Under the Federal Reports Act," were issued by the OMB as part of its effort to assure effective management of federal reporting requirements in the executive branch. Attachment A is especially important in that it appears to clarify the intent of the FRA with respect to maximizing information utility and minimizing respondent burden. Attachment A states as further requirements of Forms Clearance that agencies must submit a statement that the proposed collection of data and handling and storing of information comply with the Freedom of Information Act, the Privacy Act of 1974, and OMB Circular No. A-108, entitled "Responsibilities for the Maintenance of Records About Individuals by Federal Agencies." Attachment A, therefore, adds new review requirements, and significantly increases the complexity of the review process.

The most important single source where OMB Forms Clearance criteria are found is the Clearance Office Manual (Revised, 1973). At least one Chapter in the Manual is devoted to a discussion of review criteria. The Manual also provides a "Reviewer's Checklist" which is intended for OMB reviewers as a guide to their examination of clearance requests. The Clearance Office Manual, as well as other source documents cited above, were used as the basis for compiling and organizing a list of OMB

clearance review criteria which are presented in Appendix A of this paper.

As previously mentioned, the Education Division, operating through the structure of EDAC, has established its own set of review procedures and criteria; this review process takes place before proposed data collection plans/forms get transmitted to the OMB for final clearance. In October, 1975 an EDAC Charter was approved by the Assistant Secretary of Education. This Charter gave EDAC authority to "develop, approve and disseminate standards, justification criteria, and guidelines for planning and developing a sound body of national education data" (EDAC, 1975a). According to an EDAC internal document, "A Strategy for Education Data Acquisition" (EDAC, 1975b), it was anticipated that EDAC guidelines would take into account at least the following considerations:

- Improving the quality of and filling important gaps in the nation's body of education statistics;
- Elimination of all unused or otherwise unnecessary, or even marginally used or marginally unnecessary, data acquisition systems;*
- Simplification and standardization of reporting requirements;
- Assignment of sponsorship to the agency best able to manage the system and encouraging cooperative data collection efforts;
- Taking account, to the extent feasible, of the expressed concerns of user and respondent groups; and
- Assuring the application of sound statistical methodology in the collection, processing, and analysis of data.

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* A data acquisition system is any survey instrument, questionnaire form, reporting or record-keeping requirement, together with related definitions and reporting instructions.

After EDAC had actually been established, Congress told the National Center for Education Statistics (NCES) to review and coordinate all collection of data by the Education Division and the Office of Civil Rights. This charge would eventually become the responsibility of EDAC. Specifically, Congress handed NCES authority for supervising education data collection in the Education Amendments of 1976 (P.L. 94-482; U.S.C. 1221e-1(g)), which added a "Control of Paperwork" amendment to Section 406 of the General Education Provisions Act. The major objective of this amendment was "to eliminate excessive detail and unnecessary or redundant information requests" (Section (g)(1)(A)); it further mandated that NCES require "a detailed justification of how information once collected will be used, and an estimate of the man-hours by each education agency or institution to complete the requests" (Section 406(g)(2)(A)).

By mid-1976, EDAC had established its own review criteria (EDAC, 1976) presumably based on its own set of guidelines and legislative mandates. Appendix B of this paper contains a list of the EDAC criteria.

The preceding discussion has focused mainly on the legislative underpinnings for clearance review standards and guidelines promulgated by both the Education Division and the OMB. Also identified were some of the major source documents which describe or contain Forms Clearance criteria. The next section of this paper attempts to determine what these criteria mean, and how they might be related to the task of preparing a research (data collection) plan. Preparing a research plan is likely to involve specification of at least some of the following elements:

1. Research Problem: the purposes and questions being addressed by the research;

2. Respondent Sample: the number and characteristics of subjects in the sample or universe from which data are to be gathered;

3. Sampling Design: the plan which describes the methods/procedures for identifying and selecting a respondent sample;

4. Study Design: the model which permits the researcher to draw valid inferences about the object of study;

5. Instrumentation: the forms which contain instructions and questions designed to obtain information from respondents;

6. Data Collection: the plan specifying the time schedule, places, and frequency of data collection, and procedures to be used for gathering data;

7. Data Processing: the plan for editing, coding, and keypunching of data;

8. Data Analysis: the plan for the tabulation and summarization of data for statistical purposes.

9. Reporting Results: the plan for publication or dissemination of statistical results, including the time, type and content of reporting;

10. Data Retention: the plan for retention or disposition of data once collected, or alternatively, a determenation of how long respondents must retain the necessary source of data to meet a data collection request;

11. Data Utilization: the plan for describing both the uses and users of data collected.

The above eleven categories are intended to represent important parts of a general data collection plan, and will serve as reference points for examining Forms Clearance criteria.

Forms Clearance Criteria

For analytic purposes Forms Clearance criteria of major importance to research contractors in education can be broken down into eight main categories: (1) Need, (2) Burden, (3) Utility, (4) Cost, (5) Redundancy, (6) Survey Design, (7) Instrumentation, and (8) Administrative Requirements. Each of these categories will be defined and assessed in terms of how they might relate to elements of a research plan. The discussion to follow is based on a more detailed checklist of OMB Forms Clearance criteria presented under these eight categories in Appendix A, and on the EDAC criteria provided in Appendix B.

Need. Both EDAC and the OMB require that proposed data collection activities are both necessary and appropriate to the functions of sponsoring agencies. The FRA stipulates that the review "may determine whether or not the collection of information by a Federal agency is necessary for the proper performance of the functions of the agency or for any other proper performance" (Section 3506). A data collection request demonstrates need when (1) it serves or is related to a federal mandate or regulatory requirement, and when (2) the uses of the data are likely to fulfill that requirement. OMB appears to add the stipulation that such data to be collected are not available from any existing source or could not be more appropriately obtained by another survey or agency. In examining a data collection request (i.e., S.F. 83 and Justification Statement), a reviewer would search for documentation of a federal mandate and would then decide if that mandate would be satisfied by the proposed collection of data.

The need criterion seems to be applicable to at least two parts of a research plan: (1) the Research Problem, and (2) Data Utilization. Data justification depends, in part, on how clearly the purposes of the proposed research are described and related to the performance of the functions of the sponsoring agency, and whether the uses of the data once collected are likely to serve these purposes.

Burden. Burden reduction is the overriding objective of the FRA. There is ample statistical evidence that the burden on the public to meet federal government reporting requirements has increased dramatically during the past 35 years (Lowry, 1975), and that the absolute amount of paperwork created by federal data collection is, by any reasonable standard, excessive and costly (Paperwork Commission, 1977).

Begun under President Ford and now carried forth under the present Administration, a program of "Burden Reduction" was initiated. To achieve the objectives of this program, the OMB issued a set of guidelines (1976a, 1976b, 1978) in the A-40 series alluded to earlier. One set of OMB guidelines (No. A-40, Attachment A, Revised, 1976) is applicable to requests for clearance of proposed new reports, of revisions to existing reports, and for continued use of existing reports. Dimensions of the burden criterion are revealed in the following section of these guidelines:

> To minimize the reporting burden on respondents and to improve government efficiency, each Federal agency will consider and determine, in connection with each plan or report form submitted, whether the proposed plan or report form exceeds the limits of reasonable need or practical utility, either with respect to number of respondents, frequency of collection, or

> number and difficulty of the items, and whether all of the items of information to be furnished or recorded are essential to the central purpose of such plan or report form (Section 4(a)).

The above guidelines further stipulated that agencies are expected to make a specific justification for any data collection plan or instrument which requires more than one-half hour from respondents, and that special consideration should be given to burden on respondents (e.g., individual, small businesses, organizations) which have limited financial or human resources. For statistical surveys, new OMB guidelines (1978) specify that a request for data collection from individuals which requires more than one hour of a respondent's time will be disapproved. In addition, reviewers will examine the use of samples, cut offs, and other statistical methods which can reduce reporting burden. Both EDAC and the OMB are likely to consider in their respective reviews of data collection proposals many aspects of burden: (1) number of respondents, (2) amount of time for respondents to provide data, (3) frequency and timing of data collection, (4) number and complexity and relevance of items of data to be collected, (5) amount of resources respondent has to meet the data request, (6) alternative sources of same data need, and (7) length of time respondents must retain source of data. It is evident that the review process would most directly affect five major parts of a research plan: (1) Respondent Sample, (2) Sampling Design, (3) Instrumentation, (4) Data Collection, and (5) Data Retention.

Utility. The OMB, in particular, stipulates that information which is not used should not be collected even though it may be "needed."

Practical utility is defined as the ability of the sponsoring agency to use the information received. Says the OMB, "particular care will be exercized by agencies to insure that, need for information notwithstanding, there are no limitations in staff, in capability to process the information in a timely and useful fashion, or other constraints on the likely use of the information" (OMB Circular No. A-40, Feb. 10, 1976). An examination of a data collection request in terms of utility would probably bring into play from a reviewer's perspective at least three elements of a research plan: Data Processing, Data Utilization, and perhaps Data Analysis.

Cost. OMB S.F. 83 requests the sponsoring federal agency to estimate the cost of a proposed data collection activity to the federal government, including the costs of pretests, printing forms, mailing list compilation and maintenance, mailing or enumeration, and editing, coding, tabulation and publication of results. Other types of costs need to be documented depending on the use (i.e., administrative/management, program evaluation) of the data. These costs are primarily associated with four elements of a research plan: (1) Data Collection, (2) Data Processing, (3) Data Analysis, and (4) Reporting Results. OMB wishes to insure that the cost of the proposed data is reasonable and commensurate with the uses to be made of the data. The EDAC, however, does not officially address the question of cost in its review.

Redundancy. Both the OMB and the EDAC seek to determine whether data collection requests are duplicative or redundant with similar ongoing,

past, or even future federal data collections. EDAC specifically stipulates that there must be some "critical reason" for redundant collection of data. Determination of redundancy introduces an element of coordination into federal statistical activities. At least two independent studies (Peat, et al., 1975; House of Representatives, 1977) have argued for strengthening the OMB Clearance process so that it can contribute more to the overall management of federal data acquisition efforts. Their view seems to be that the forms review function is not separable from the planning and coordination of the federal statistical system. Specifically, Peat, et al., (1975) recommended that Forms Clearance expand its role of coordination by establishing procedures for controlling burden at the initiation and development stages of new data collection requirements (i.e., when Congress mandates a program requiring or anticipating the collection of data). Better coordination particularly at early stages of creating federal information requirements would result in less duplication and less burden on respondents.

There appears to be no direct interplay between the redundancy criterion and internal properties of a research plan. For example, there is no way to control redundancy in any specific part of a research plan, as was the case for the burden criterion. Nor is it clear when a data collection request is considered redundant; redundancy could refer to the duplicative purposes of the research or to the data collection instruments used, or both.

Survey Design. Both the spirit and intent of the OMB and the EDAC are to maintain and upgrade the quality of federally sponsored statistical surveys. The standards of survey design promulgated specifically by the OMB and probably also used by the EDAC cover many elements of a research plan: Research Problem, Respondent Sample, Sampling Design, Study Design, Data Collection, Data Processing, Data Analysis, Reporting Results, and Data Retention. Most review standards on survey design give clearance reviewers considerable latitude as to how they are applied. Certain standards are quite fixed and allow for little or no such latitude in judgment, as evident in the following three examples: (1) special justification is necessary for a survey requiring more than one-half hour of a respondent's time; (2) a general rule just adopted by the OMB that data collections for statistical purposes which have an expected response rate of less than 75% will not be approved unless the Office of Federal Statistical Policy and Standards of the Department of Commerce concurs in the request; and (3) data collection activities having an expected response rate of less than 50% will automatically be disapproved.

The technical design of a research plan is given careful scrutiny by reviewers. Reviewers will seek to determine, for example, if the target population is clearly defined, if the most economical and appropriate sampling design is used, if the sample size is large enough for the expected accuracy of the results, if the data collection method, and frequency and timing of the data collection are reasonable and appropriate, and if the methods for editing, coding, and tabulating the data are sufficient.

Instrumentation. This criterion category includes standards for the forms and related instructions which are designed to collect data from respondents. The review process involves a technical and content review of the question items, instructions given to the respondent for answering items, the form design, and transmittal letter. The review tries to assure that each question asked is germane to the purpose for which the inquiry is being conducted. Both the EDAC and the OMB reviews also give attention to the need for using standard definitions and classifications developed for federal statistical purposes. For example, it is possible for data collection requests to be rejected on grounds that response options are inappropriate, or the transmittal letter does not convey to the potential respondent clear and accurate information about the purposes, need, and uses of the data to be collected. Federal agencies must make special justification of questions asked in sensitive areas for the individual respondent such as sex behavior, mental illness, family life, race, religious beliefs, and political affiliation. Questions which are objectionable because they are demeaning or self-incriminating will also be rejected. Finally, it is expected that an appropriate pledge is to be given to the respondent to maintain confidentiality and that adequate administrative arrangements for disposing of complete report forms are established consistent with that pledge.

Administrative Requirements. OMB Forms Clearance makes it a condition of approval by virtue of OMB Circular No. A-40 that data collection requests comply with the Privacy Act of 1974 (5 U.S.C. 552(a)) and

the Freedom of Information Act (P.L. 90-23, 5 U.S.C. 522). The Privacy Act provided that the OMB develop implementation guidelines and regulations for federal agencies. On July 1, 1975 OMB issued Circular No. A-108, entitled "Responsibilities for the Maintenance of Records about Individuals by Federal Agencies." Thereafter, OMB required all federal agency data collection proposals to comply with A-108. Reviewers are, therefore, expected to inspect clearance requests in terms of Privacy Act, Freedom of Information Act, and A-108 implications.

The Privacy Act is designed to provide certain safeguards against unwarranted invasion of personal privacy by federal agencies which maintain, collect, use and/or disseminate a system of records. A system of records is defined as "a group of any records under the control of any agency from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifying particular assigned to the individual" (5 U.S.C. 552a(1)). Reviewers must make a determination that the Privacy Act applies or does not apply to a given data collection request according to this definition. It is impossible to know precisely what aspects of a clearance request to examine in light of the Privacy Act. At least the following basic responsibilities of federal agencies dictated by A-108 would appear to provide some direction to Forms Clearance review:

- Inform individuals from whom information about themselves is collected of the purposes for which the information will be used and their rights, benefits, or obligations with respect to supplying that data (Section 5(a)(3)).

- Establish reasonable administrative, technical, and physical safeguards to assure that records are disclosed only to those who are authorized to have access and otherwise to protect against any anticipated threats or hazards to their security or integrity which could result in substantial harm, embarrassment, inconvenience, or unfairness to any individual on whom information is maintained (Section 5(a)(5)).

Additionally, the Privacy Act requires federal agencies to inform in writing each individual from whom personal information is requested of: (1) the specific statute or executive order which authorizes collection of the data; (2) the routine uses which may be made of the information, where "routine uses" refers to disclosures outside the agency holding the records for purposes which are consistent with the purposes for which the information was collected; (3) whether furnishing the information is mandatory or voluntary; and (4) the effects, if any, of failure to provide the requested information (Weinberger and Michael, 1977). The Privacy Act and the A-108 guidelines suggest that the following parts of a research plan might come into play during the clearance review process: Instrumentation (e.g., transmittal letter), Data Processing, Reporting Results, Data Retention and Data Utilization.

Proposed federal data collections must also comply with the Freedom of Information Act. On July 4, 1967, certain amendments to the public information section of the Administrative Procedures Act (5 U.S.C. 522) took effect. These amendments have become popularly known as the Freedom of Information Act. This Act provides for making information held by federal agencies available to the public unless it comes under one of the specific categories of matters exempt from public disclosure. At the

same time, the Act recognizes that records which might impair the rights of privacy or important governmental operations must be protected from disclosure. Most federal executive agencies have issued regulations to implement this Act, including the OMB. These regulations inform the public where certain types of information may be readily obtainable, how other information may be obtained on request, and what internal agency appeals are available if a member of the public is refused requested information. The provisions in this Act, however, do not appear to have a direct effect on assessing substantive aspects of a research plan but may have important implications for what kind of information a research contractor decides to report, in what manner, to its sponsoring agency.

Discussion

The balance of this paper will focus on three major questions which attempt to facilitate understanding of the federal government's role vis a vis Forms Clearance in shaping research practices of federal education agencies and their contractors. These questions also serve as a vehicle for summarizing, and exploring the implications of, previous parts of the paper. The three questions to be considered in this discussion are as follows: (1) What is the scope of Forms Clearance review? (2) What major functions are performed by the review? (3) What are the achievements of Forms Clearance with reference to the goals of the Federal Reports Act?

What is the Scope of Forms Clearance Review? It is self-evident from the description of review criteria given earlier that there are

many ways in which educational research plans can be effected by Forms Clearance review.

Insert Table 1 here

Table 1 presents a general summary of the major categories of review criteria in relation to the elements used to describe a basic research plan. Basically the scope of Forms Clearance review entails an examination of the proposed research methods and procedures (i.e., technical review), and of the purposes and uses of the data to be gathered (i.e., substantive review). Substantive review can be easily misconstrued as an attempt by Forms Clearance to perform a censorship role with respect to subject matter content. Forms Clearance was never intended to act in a censorship capacity. The OMB is required, however, to make a determination of whether the purposes of a data collection are consistent with the performance of a necessary federal agency function. The right of the OMB does not extend to making judgments, at least in any offical capacity, about the worth of these agencies' functions. While Forms Clearance does not act intentionally or rightfully in the role of censor, there may be some conditions where censorship in effect does occur. Such censorship comes about possibly when the EDAC or the OMB objects to the use of particular methods of a study and proposes alternative methods which, in turn, force the sponsoring research agency and its contractor to reconceptualize (i.e., modify purposes and scope of study) the original study. A vivid example of this happening is

documented in a case study (Coan, 1977) which showed how differences between the contractor and Forms Clearance reviewers over the use of a survey sampling procedure known as "random digit dialing" eventually caused the contractor and sponsoring agency to renegotiate significant parts of its original contract.

What Major Functions Are Performed by Clearance Review? Overall, Forms Clearance operates chiefly as a quality control mechanism for maintaining and upgrading the quality of federal data collections, and as a protective mechanism for ensuring that certain rights of respondents are not abused or curtailed. These two functions are implicit in the Federal Reports Act and are reflected in the review criteria themselves.

The majority of review criteria, particularly in the "survey design" domain, appears to serve the quality control function. In its effort to improve the quality of government sponsored research, Forms Clearance, in general, does not advocate the use of particular research methods or practices. On the other hand, those sets of criteria which serve the protective function (i.e., burden, administrative requirements) generally tend to promote increased standardization of research practice. These criteria are regulatory in nature and define the limits of acceptable or unacceptable research practice much more clearly than, for example, the OMB standards for survey design. In the past three years, new and more stringent Forms Clearance regulations have been adopted or developed by the OMB in response to: (1) mounting federal paperwork burden, (2) the need for protecting the public against unwarranted

government invasion of individual privacy, and (3) the need for promoting the public's right to know or have access to government collected information. Increasing regulation in, or adding new standards to, Forms Clearance review is not likely to have much overall effect on either improving the quality of government sponsored research or reducing respondent burden. The reasons for this will be discussed next.

What are the Achievements of Forms Clearance? A formal set of Forms Clearance standards and regulations were established by the OMB and EDAC in order to achieve objectives set forth by the Federal Reports Act. Briefly, those objectives were to minimize duplication, minimize cost, minimize reporting burden, and maximize utility of information collected by the federal government. However, significant limitations of the Federal Reports Act make it virtually impossible to maximize the intended effects of applying Forms Clearance criteria. The Act embraces only 18% of all sources of federal reporting requirements (Peat, et al., 1975); it does not cover all federal government agencies, such as the Internal Revenue Service and federal regulatory agencies; it contains no penalty provisions for agencies which do not fully comply with its requirements; and it does not deal with the major causes of paperwork burden generated by the federal government. Moreover, the OMB appears to be reluctant to use its authority to disapprove data collection activities. Of the total number of clearance requests for repetitive reports received by the OMB in 1976, roughly 6% were disapproved. Other data indicate that the OMB rejects approximately 10% of single-time

reports and only 3% of repetitive reports (House of Reprecentatives, 1977). Even if OMB's rejection rate were much higher, the effect on burden reduction would still be inconsequential. According to a report of the Commission on Federal Paperwork (1977), half of the total number of hours of reporting burden is accounted for by two federal agencies: the Department of Health, Education and Welfare (DHEW) and the Federal Energy Administration. Nearly 60% of the DHEW total was attributed to the standard certificates of birth, death, marriage, divorce and annulment required for the Nation's vital statistics. Coan (1977) estimated that federal education contracts accounted for less than 10% of the total burden created by the Division of Education. The total burden reduction which could be achieved by Forms Clearance relative to the nation's paperwork burden, even if all contract research in education were to be eliminated, would probably be a small fraction of a percent. Adding new and more stringent standards and regulations for use in reviewing data collection requests on a form by form basis will not do much to solve the problem of excessive government data collection or make government-wide improvements in research practice. Contractors in education should expect, however, that their research plans will be carefully reviewed by EDAC and the OMB according to the criteria described in this paper despite the fact that the review process will result in little or no progress toward achieving the objectives of the Federal Reports Act.

Table 1

Forms Clearance Criteria as Related to
Parts of an Educational Research Plan

Research Plan Component	Criterion Category							
	Need	Burden	Utility	Cost	Redundancy	Survey Design	Instrumentation	Administrative Requirements
(1) Research Problem	•				•	•		
(2) Respondent Sample		•				•		
(3) Sampling Design		•				•		
(4) Study Design						•		
(5) Instrumentation		•		•	•		•	•
(6) Data Collection		•		•		•		
(7) Data Processing			•	•		•		•
(8) Data Analysis			•	•		•		
(9) Reporting Results				•		•		•
(10) Data Retention		•				•		•
(11) Data Utilization	•		•					•

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APPENDIX A

OMB FORMS CLEARANCE REVIEW

CRITERIA CHECKLIST

NEED

1. Is the information requested necessary to the agencies program or for compilation of statistics of general public interest?
2. Does the proposal being reviewed satisfy the need which has been indicated?
3. Are the specific uses to be made of the data explained?
4. Are data users identified?
5. Could the information more appropriately be obtained as part of another survey by this or some other agency?
6. Are there any laws or regulations which require such data collection?
7. Is the information needed to carry out a new or continuing Government program?

BURDEN

1. Does the request for data collection require more than one hour of the respondent's time?
2. Can the respondent burden be reduced by sampling?
3. How frequently will data collection occur? Is this frequency reasonable?
4. Are the questions answerable from the records or the knowledge of the respondents without undue burden?
5. If exact information may not be available, are estimates acceptable and are there grounds for believing they will be reasonably accurate?
6. Is the basis for estimating the reporting burden explained? Is the average time per response figure realistic?
7. Is a reasonable time allowed for completing and returning the questionnaire?
8. Are the questions asked relevant to the purposes of the inquiry?
9. Does the form contain excessive detail (can it be shortened, can items be grouped or omitted)?
10. Are respondents (e.g., large companies) given advance notice of a new or changed request for information which may be burdensome to provide?
11. Are changes in regulations or instructions for forms highlighted in some way to reduce the burden?
12. Are records to be retained, and if so, for how long (a period of longer than 2 or 3 years should be questioned)?

UTILITY

1. Does the information to be collected have practical utility (i.e., does the sponsoring agency have the ability to use the information)?
2. Are there any limitations in staff or in capability to process the information that would preclude timely use of the data?

COST

1. Is the cost of the proposal reasonable and commensurate with uses to be made of the data?

REDUNDANCY

1. Are the data needed available from another agency or from some other reliable source?

SURVEY DESIGN

1. Is the precise purpose of the survey clearly stated in terms of need for the data, hypotheses to be tested, or problems to be solved?
2. Is the target population clearly defined?
3. Is the most economical, feasible, and appropriate sampling design used?
4. If sampling is used, is it probability sampling and if not, why not?
5. Is the size of the sample appropriate for the expected accuracy of the results and for the level of detail required?
6. Is the source of the list of respondents identified? Is it reasonably complete and current?
7. Is the data collection method, the frequency of collecting the data, and the timing of the data collection appropriate?
8. Are follow-up procedures necessary, and if so, are they sound (e.g., includes study of nonrespondents where nonresponse rate is high)?
9. Are procedures for editing, coding, and tabulating the data included in the survey plan? Are they sufficient? What methods are used in handling imcomplete returns or refusals?
10. Is a pre-test advisable, and if so, has it already been made or are plans for one included? If a pre-test has been made, are the results documented?
11. Have plans for tabulating, analyzing, and publishing the data been developed, and are funds available?
12. Is the time schedule for completing collection and analyses of data feasible?
13. In the case of record-keeping requirements, is a retention period specified? Is this period reasonable?

INSTRUMENTATION

1. Are questions clearly and simply written?
2. Are the instructions part of the question form rather than on a separate sheet?
3. Are standard classifications and definitions used where appropriate (e.g., Standard Industry Classification, Enterprises Standard Industrial Classification, Commodities Classifications, Occupational Classification, Standard Metropolitan Statistical Areas, Science and Engineering, poverty, race and color, etc. See OMB Circular No. A-46 revised).
4. Is the print of the questions and instructions large enough for easy reading?
5. Is there adequate space allowed for answers?
6. Are the agencies name, the agency form number, the title, the edition (if appropriate) and any control symbols identified on the form?
7. Are the instructions in the form itself (for a mail survey) and do they include the address to which the completed form is to be returned?
8. Are the items on the form arranged in a logical order?
9. Is the agency's need for the data or its importance to the data users clearly and persuasively stated, paricularly where response is voluntary?
10. Is a commitment made to provide a copy of the published report (especially if respondents are business firms or institutions)?
11. Does a signature by a high official officer appear on the letter?
12. Is the language of the letter tailored to the type of respondent?
13. Is a target date for a return of the form or questionnaire stated?
14. Is confidentiality pledged if information of a private nature is requested? (Is pledge also stated on the form itself?)
15. Does it convey a misleading impression that response is mandatory when in fact it is not?

ADMINISTRATIVE REQUIREMENTS

1. Does the proposal respect and protect the privacy of individuals (e.g., persons, businesses, institutions)?
2. Does the form contain questions in sensitive areas for the individual respondent such as sex behavior, mental illness, family life, race, religious beliefs, political affiliation, and the like for which special justification is needed?

3. Are questions asked which might be considered by respondents as objectionable, demeaning, or self-incriminating, and if so, is there reasonable justification for them (e.g., serving important public interests)?

4. If collection of sensitive data is in the public interest, are there adequate safeguards to protect the individual (e.g., informed consent, anonymity)?

5. Are the data requested to be kept confidential, and if not, should they be?

6. Is an appropriate pledge given to the respondent to maintain confidentiality?

7. Are administrative arrangements for carrying out the pledge adequate?

8. Does the pledge of confidentiality conflict with federal disclosure laws (e.g., Freedom of Information Act)?

9. Is the ultimate disposition of respondents' answers to questions consistent with the pledge of confidentiality?

APPENDIX B

EDAC Criteria

These criteria have been adopted by the DHEW Education Data Acquisition Council (EDAC) to guide the EDAC Review Groups in deciding what data acquisition systems should be included in the Annual Plan. These criteria will be in effect until superceded or amended. The Council expects the Review Groups to exercise their best collective judgement in applying these criteria; the Council expects the sponsors of data acquisition systems to cooperate with the Review Groups in adjusting the specifications of proposed systems in order to meet these criteria. For a data acquisition system to be included in the Plan, the appropriate Review Group, using informed and impartical judgement, must have been pursuaded that these criteria have been met. The a priori judgement of the sponsor who has a legal responsibility to fulfill should be afforded considerable weight. No system may be used, nor may OMB clearance be requested if a system is not in the Plan.

1. IS THERE A JUSTIFIABLE NEED FOR THE DATA?

   Sponsor must convince the Review Group that the data to be collected are needed to serve and are relevent to some aspect of:

   - execution of Federal law — i.e., program management, evaluation, policy planning and analysis, research and development, or
   - providing "full and complete statistics on the condition of education in the United States" (applicable exclusively to NCES data acquisition systems except for secondary uses by other agencies)

   The types of evidence related to this question vary with the intended use or uses of the data:

   a. in all cases, the text of the statutory and/or regulatory requirement or authorization should be provided

   b. in all cases, the sponsor should state what would be the effect, impact, or penalty if all or a part of the data were not collected

   c. for program management, actual and explicit examples of the kinds of decisions to which the data relate — e.g., qualifying grantees under applicable laws and regulations, determining the appropriate amounts of grants (by formula or otherwise), setting priorities and formulating budgets, measuring performance

d. for evaluation, evidence that the evaluation activity is included in the OE evaluation plan, or has been coordinated with the Office of Planning, Budgeting and Evaluation of OE, and identification of the intended users of the evaluation results, (i.e., program managers, the Commissioner, the Secretary, the Executive Office of the President, the Congress); with respect to the issue of relevance, evidence of the program objectives, problems, or issues to be evaluated

e. for policy planning and analysis (frequently the designated purpose of mandated studies,) specific statements of the problems and/or issues and the specific questions implicit in the problem or issues to wnich the requested data are relevant; statements as to what policy-making level of government (e.g., Commissioner, Secretary, Executive Office of the President, the Congress) the policy planning or analysis is intended to serve

f. for research and development, evidence that the research or development activity is included in an approved research plan; with respect to relevance, statements of the underlying problem or issue to be investigated

g. for "condition of education" information, a statement of the public policy issues at stake, examples of the kind of use to which such data have been or will be put, and, where possible, supporting claims of need by user groups

2. IS THE PROPOSED DATA ACQUISITION SYSTEM REDUNDANT OR CONFLICTING WITH OTHER ONGOING OR PROPOSED SYSTEMS?

a. Are the data already being collected (in identical or marginally similar format) through another data acquisition system in the Plan? If so, could two systems be consolidated (with or without some compromise in format, definitions, or timing)?

b. Is there some critical reason for redundant collection of the proposed data?

c. Could the data be collected at a more appropriate level in the respondent institutional system?

d. In developing the instrument has the sponsor made use of existing standard terminology? If not, why not?

3. IS THE PROPOSED DATA ACQUISITION SYSTEM UNNECESSARILY OR UNREASONABLY BURDENSOME TO THE AFFECTED INSTITUTIONS OR INDIVIDUALS?

   a. The answer to this question will rest on an examination of information provided as to the number of respondents, the man-hours required to provide the data, and the number and complexity of the items of data to be collected.

   b. Is the timing reasonable and appropriate in the light of the requirements of the user and of the respondents' problems in acquiring or searching the necessary source records?

   c. Does the sponsor propose to provide (financial or technical) assistance to the respondents, or must respondents bear the full burden?

4. HAVE STANDARD TERMINOLOGY AND DEFINITIONS BEEN USED?

   a. With respect to terms related to the field of education, this means using NCES Handbook terminology and definitions, unless suitable reasons for not doing so are presented.